



August 1, 2003

David Solomon, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

John Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Interim Report of Cleveland PCS, LLC
On E911 Deployment and Implementation**

Dear Messer's Solomon and Muleta:

Pursuant to the FCC's Order to Stay issued in CC Docket No. 94-102,¹ and the FCC's June 30, 2003 Public Notice in the same docket,² Northcoast Communications, LLC, and its subsidiary Cleveland PCS, LLC ("Cleveland PCS") hereby file our Interim Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service. Cleveland PCS presently provides PCS service in several markets in Ohio. Our service area encompasses 14 PSAPs.

1. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid).

We provide service in the State of Ohio, and Ohio currently does not have a cost recovery mechanism in place for PSAPs. Consequently, Cleveland PCS

¹ FCC 02-210, released July 26, 2002.

² *Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings By Small Sized Carriers*, DA 03-2113, released June 30, 2003.

has not received Phase I or Phase II E911 implementation requests from any of the 14 PSAP locations that we route calls to within our service area.

2. The carrier's specific technology choice (i.e., network-based or handset-based solution, as well as the type of technology used).

Cleveland PCS has chosen handset-based solution for Phase II and the technology is CDMA.

3. Status on ordering and/or installing necessary network equipment.

Currently, Cleveland PCS, LLC is in the process of procuring the necessary software from Lucent to load in the switch. We are also working with a third party company to implement the location-based triggers for Phase II.

4. If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets.

We started selling ALI-capable handsets in the February 2003 timeframe and already have achieved over 16% subscriber penetration of ALI-capable handsets. The current ALI-capable handset models that Cleveland PCS offers to customers are Motorola 120e, Kyocera 2325, and 3225.

5. The estimated date on which Phase II service will first be available in the carrier's network.

We estimate that Cleveland PCS will begin offering Phase II service by November 1, 2003. Since Cleveland PCS has not yet received any requests for Phase I or Phase II service, we clearly will be in compliance with the FCC's Phase II implementation requirements.

6. Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.

At this time, we believe that Cleveland PCS can meet the ultimate Phase II implementation date of December 31, 2005.

Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

If you have any questions regarding this report, or require additional information, please contact me, or Terry Cavanaugh at Cole, Raywid & Braverman, LLP, and counsel for Northcoast, at 202-828-9857.

Sincerely,

/s/ Stephen M. Curtin

Stephen M. Curtin
President
Cleveland PCS, LLC

cc: Thera Bradshaw, President
Association of Public-Safety Communications
Officials-International, Inc.
351 N. Williamson Blvd.
Daytona Beach, FL 32114

John R. Melcher, ENP, President
National Emergency Number Association
422 Beecher Road
Columbus, OH 43230

Evelyn Bailey, President, NASNA
94 State Street, Drawer 20
Montpelier, VT 05620-6501

Robert M. Gurss
Shook, Hardy & Bacon, LLP
600 14th Street, NW, Suite 800
Washington, DC 20005
Counsel for APCO

James R. Hobson
Miller & Van Eaton, PLLC
1155 Connecticut Avenue, NW, Suite 1000
Washington, DC 20036
Counsel for NENA and NANSA